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**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF ARIZONA**

**IN RE: BARD IVC FILTERS  
PRODUCTS LIABILITY LITIGATION**

MD No. 02641

**JOINT SUBMISSION AND  
STIPULATION FOR ENTRY OF  
CASE MANAGEMENT ORDER  
FOR FORM AND FORMAT FOR  
PRODUCTION OF ESI AND  
DOCUMENTS**

In accordance with Case Management Order No. 2, the Parties hereby submit, and stipulate to entry of, Proposed Case Management Order No. 8 concerning the form and format for the production of electronically stored information (“ESI”) and physical documents.

In Case Management Order No. 2, the Court ordered the parties to present the Court an ESI protocol addressing format of production, preservation, and other relevant ESI-discovery matters. The parties have reached agreement on ESI issues relating to form and format of production and submit their Proposed Case Management Order No. 8 to set the protocols for the form and format of production of ESI and physical documents. The parties continue to work on the other ESI issues set forth in Case Management Order No. 2 and will provide the status of those issues in the parties’ joint report for the January 29, 2016 case management conference.

1 RESPECTFULLY SUMITTED this 15th day of January 2016.

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4 By: /s/ Paul Stoller

By: /s/ Matthew Lerner

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12 *Plaintiffs*

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*Peripheral Vascular, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of January 2016, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Nancy Jo Koenes

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